

CHERYL L. GRAVES, ESQ.
FARLEY & GRAVES, P. C.
3003 Minnesota Drive, Suite 300
Anchorage, Alaska 99503
(907) 274-5100 Fax (907) 274-5111

Attorneys for Plaintiff, LITTLE WHITE DOVE,
LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA**

IN THE MATTER OF THE COMPLAINT OF
LITTLE WHITE DOVE, LLC, an Alaska
Limited Liability Company, Owner of the F/V
LITTLE WHITE DOVE, Official No. 607001,
for exoneration from or limitation of liability,

Plaintiff.

IN ADMIRALITY

Case No. 3:05-CV-0067-JWS

MOTION TO EXTEND DISCOVERY

Petitioner motions the court to extend discovery. It appears the parties mistakenly believed discovery was stayed already due to the filing of the appeal, until the Court's recent discovery order was received. Petitioner apologizes for this confusion, and did not realize until the Order that an interlocutory appeal was at issue. After the appearance of new counsel for the claimants, extensions of discovery were discussed, however, the motion to proceed in State Court and subsequent appeal were filed. The parties have not yet completed discovery which will require deposition travel and proceedings to occur in Cold Bay, Alaska and Sand Point, Alaska. Petitioner respectfully requests 60 days to complete depositions until November 15, 2006, and expects hearing of the limitation could occur shortly thereafter.

CROSS MOTION TO EXTEND DISCOVERY
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/AW

DATED this _____ day of September 2006 at Anchorage, Alaska.

FARLEY & GRAVES, P. C.

By: s/Cheryl L. Graves
CHERYL L. GRAVES
3003 Minnesota Drive, Suite 300
Anchorage, AK 99503
Phone: (907) 274-5100
Fax: (907) 274-5111
E-mail: cgraves@farleygraves.com
dcharter@farleygraves.com
Alaska Bar No.: 9711062
Attorneys for Plaintiff, Little White Dove,
LLC

CERTIFICATE OF SERVICE

Pursuant to Civil Rule 5, I hereby certify that on this
11th day of September 2006, I caused a true and correct copy
of the Cross Motion to Extend Discovery to be served
electronically on the following person(s):

Charles W. Ray, Jr., Esq.
Law Offices of Charles W. Ray, Jr., P.C.
711 H Street, Suite 310
Anchorage, AK 99501

By: s/Cheryl L. Graves